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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

1 WILLIAM SCHECHNER AND JOHN
2 LOBERTINI,

3 Plaintiffs,

4 v.
5 KPIX-TV, CBS BROADCASTING, INC.
6 and DOES 1 through 10, inclusive,
7 Defendants.

8 Case No. CV-05049 MPH CV 08-05049 MHP

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**STIPULATION AND [PROPOSED]
ORDER FOR A BRIEF CONTINUANCE
OF EXPERT DEPOSITION DISCOVERY**

Complaint Filed: October 16, 2008
Date of Removal: November 5, 2008
Trial Date: No date set.

WHEREAS, the current deadline for completing statistical expert deposition discovery is August 19, 2009;

WHEREAS, the parties seek to reduce the costs associated with expert deposition discovery by scheduling each statistical expert for one half day of deposition testimony on the same date;

WHEREAS, Plaintiff's expert statistician will be out of the country and unavailable for deposition between August 10 and 19, 2009;

WHEREAS, the next available date that both experts are available for deposition is August 24, 2009, three business days after the Court ordered deadline for completing expert deposition discovery; and

WHEREAS, the parties met and conferred about this scheduling change.

STIPULATION AND [PROPOSED] ORDER FOR
A BRIEF CONTINUANCE OF EXP. DEP. DISC.

Case No. CV-05049 MPH

THE PARTIES STIPULATE AND AGREE to modify the Court's Minute Order to reflect a 3 court days extension of the deadline to complete statistical expert deposition discovery from August '19, 2009 to August 24, 2009. The rest of the Court's Minute Order (concerning the exchange of expert reports and the summary judgment briefing schedule) will remain unchanged.

DATED: July 28, 2009

Respectfully submitted,

McGUINN, HILLSMAN & PALEFSKY

By: _____ /S/
JOHN A. McGUINN

Attorneys for Plaintiffs
WILLIAM SCHECHNER and JOHN
LOBERTINI

**I HEREBY ATTEST THAT THE CONTENT OF THIS DOCUMENT IS ACCEPTABLE
TO ALL PERSONS REQUIRED TO SIGN THIS DOCUMENT.**

DATED: July 28, 2009

Respectfully submitted,

LITTLER MENDELSON

By: _____ /S/
MATTHEW P. VANDALL

**Attorneys for Defendant
CBS BROADCASTING INC.**

IT IS SO ORDERED:

Dated: July 29, 2009

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